

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,
L.L.C., CONTRARIAN CAPITAL FUND I,
L.P., CONTRARIAN DOME DU GOUTER
MASTER FUND, LP, CONTRARIAN
CAPITAL SENIOR SECURED, L.P.,
CONTRARIAN EM II, LP, CONTRARIAN
EMERGING MARKETS, L.P., POLONIUS
HOLDINGS, LLC, and CONTRARIAN
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel.
Nos. 19 Civ. 3123 & 18 Civ.
11940]

Hon. Analisa Torres

DECLARATION OF JOSEPH E. NEUHAUS

I, JOSEPH E. NEUHAUS, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following facts are true and correct to the best of my knowledge, information, and belief.

1. I am a member of the law firm Sullivan & Cromwell LLP, counsel to the defendant Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned case.

2. I respectfully submit this declaration in support of the Republic’s Reply Memorandum in Support of its Motion for a Stay (the “Reply”).

3. Attached as Exhibit A is a true and correct copy of the memorandum published by the Office of the Special Attorney General of the Bolivarian Republic of Venezuela on July 1, 2019 entitled “*Guidelines for the Renegotiation of the Chávez/Maduro Era Legacy Public External Debt.*”

4. Attached as Exhibit B is a true and correct copy of the Statement of Interest and accompanying exhibits filed by the United States Government in *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, No. 1:17-mc-00151-LPS, ECF No. 212 (D. Del. July 16, 2020).

Dated: New York, New York
August 10, 2020

/s/ Joseph E. Neuhaus
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